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1 **UNITED STATES DISTRICT COURT**
2
3 **CENTRAL DISTRICT OF CALIFORNIA**

4 MOOG INC.,

5 Plaintiff,

6 v.

7 SKYRYSE, INC., ROBERT
8 ALIN PILKINGTON, MISOOK
9 KIM, and DOES NOS.1-50,

10 Defendants.

Case No. 2:22-cv-09094-GW-MAR

**JOINT STIPULATION TO EXPAND
WORD LIMITS ON PLAINTIFF AND
COUNTERDEFENDANT MOOG
INC.'S FORTHCOMING
OPPOSITION TO DEFENDANT AND
COUNTERCLAIMANT SKYRYSE,
INC.'S MOTION TO STAY AND
INDIVIDUAL DEFENDANTS'
JOINDER TO THE MOTION TO
STAY**

Complaint Filed: March 7, 2022

Counterclaims Filed: January 30, 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and
2 Counterdefendant Moog Inc. (“Moog”), Defendant and Counterclaimant Skyryse,
3 Inc. (“Skyryse”), Defendant Robert Alin Pilkington (“Pilkington”), and Defendant
4 Misook Kim (“Kim”) (Kim and Pilkington are collectively referred to as the
5 “Individual Defendants”) (Moog, Skyryse, and the Individual Defendants are
6 collectively referred to as the “Parties”) through their respective attorneys of record,
7 as follows:

8 WHEREAS, on March 15, 2023 Skyryse filed its Notice of Motion and
9 Motion for a Temporary Stay (the “Motion to Stay”) (Dkt. 392);

10 WHEREAS, on March 16, 2023, the Individual Defendants filed a Joinder to
11 the Motion to Stay (the “Joinder”) (Dkt. 393);

12 WHEREAS, L.R. 11-6.1 provides that “[e]xcept as otherwise provided in this
13 rule or ordered by a judge,” “no memorandum of authorities, pretrial brief, trial brief,
14 or posttrial brief may exceed 7,000 words, including headings, footnotes, and
15 quotations but excluding the caption, the table of contents, the table of authorities,
16 the signature block, the certification required by L.R. 11-6.2, and any indices and
17 exhibits”;

18 WHEREAS, Moog intends to oppose the Motion to Stay and Joinder;

19 WHEREAS, given that it will be opposing both the Motion to Stay and the
20 Joinder, Moog contends that it requires more than the 7,000 words as prescribed
21 under L.R. 11-6.1 in Opposition to the Motion to Stay;

22 WHEREAS, the Parties have stipulated and agreed that word limit for Moog’s
23 Opposition to Motion to Stay, is expanded to 8,000 words including headings,
24 footnotes, and quotations but excluding the caption, the table of contents, the table
25 of authorities, the signature block, the certification required by L.R. 11-6.2, and any
26 indices and exhibits; and

27 WHEREAS, any reply brief in support of either the Motion to Stay or Joinder
28 will be limited to 7,000 words as generally prescribed under L.R. 11-6.1.

1 NOW THEREFORE, subject to the Court's approval, the Parties stipulate
2 and agree that the word limit for Moog's Opposition to Skyrise's Motion to Stay
3 and the Individual Defendants' Joinder is expanded to 8,000 words.

4
5 **IT IS SO STIPULATED.**

6
7 Dated: March 21, 2023

8 SHEPPARD, MULLIN, RICHTER &
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10 By: /s/ Kazim A. Naqvi
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25 By: /s/ Grant B. Gelberg
26 Grant B. Gelberg
27 Counsel for Defendant Misook Kim
28

ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Kazim A. Naqvi, attest that
concurrence in the filing of this document has been obtained by all its signatories.

Dated: March 21, 2023 /s/ Kazim A. Naqvi